

06 October 1995

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MEMORANDUM

From: David Porter, SOUTHDIV

To: Lawson Anderson, EnSafe
Tonya Barker/Rob Williamson, NSA Memphis
Jack Carmichael, USGS
Jordan English/Jim Morrison, TDEC (Memphis)
Sue Hosmer, NSA Memphis
Keith Johns/Diane Cutler, EnSafe (Raleigh)
LCDR Terry Jones, NSA Memphis
Mark Taylor, SOUTHDIV
Clint Willer, TDEC (Nashville)
David Williams, EPA Region IV

Subj: NAS MEMPHIS BRAC CLEANUP TEAM (BCT) MEETING, 25-26 SEP 95

Encl: (1) Minutes from 25-26 September BCT Meeting

1. Enclosure (1) is forwarded for your review and information. The list below summarizes follow-up assignments from the BCT meeting:

EnSafe (Lawson Anderson):

- Conduct TV inspection of storm sewer line serving former Hangar N-6 and the surrounding area (field work scheduled for week of 9 October).
- Incorporate finding-to-date for all Assembly A SWMUs in the Assembly A RFI report (submit report in sections - by SWMUs).
- Complete Assembly B RFI Report week of 02-06 October.
- Complete Assembly C RFI Report week of 09-13 October
- Develop "voluntary corrective action" plans for SWMUs 1, 60 (after additional sampling is conducted), N-122, and N-7, and conduct voluntary correction actions on N-7 and N-122 the week of 09 October.
- Overlay revised color map (environmental condition of property) with the community's reuse plan.
- Develop sampling plan for PCB area on the southside, based on old aerial photograph, for activity to collect samples during Assembly D field work 5/6 October.
- Review Work Plan for SWMUs 66/67 and develop POA for sampling.
- Conduct PCE sampling along southside fence line at the rear of the commercial dry cleaners while the DPT rig is on site 16 October - 10 November.
- Conduct Additional sampling at SWMUs 5, 40, and 60.
- Conduct Assembly D field work.
- Conduct Assembly E field work.
- Conduct Follow-up Gray Areas field work.

EPA Region IV (David Williams):

- Provide review comments on RFI Reports for Assemblies A, B, and C as they become available.
- Provide approval for the Work Plans for Assembly A (additional investigation), Assembly D, Assembly E, and the Follow-up Gray Areas.

- Provide EPA's checklist to determine the need for a radiation survey.

NAS Memphis - Environmental (Tonya Barker/Rob Williamson):

- Coordinate the disposal of IDW from Assembly A investigation - confer with new CO, CAPT Mallory, regarding the use of Federal Prisoner labor/use of SWMU 60 as a disposal site.
- Confirm possible locations of past uses of radioactive paints with Mr. Fumich, and coordinate with TDEC on radiation survey.
- Collect samples from PCB area on the southside (coordinate with EnSafe during Assembly D investigation 5/6 October).
- Arrange for the cleanup of SWMU 67 through MWR or DynCorp using the Work Plan developed by Morrison Knudson, and oversee the operations.
- Assuming no contamination is found during the sampling at SWMU 66, arrange for the cleanup by DynCorp, including the recycling of CFC from disposed refrigerators.
- Request meeting with TDEC Nashville RCRA personnel to discuss RCRA operations (such as transportation of hazardous waste) on the northside after the base becomes open to the public.

SOUTHDIV (David Porter):

- Develop RAB agenda and presentations, including general status report and fiscal year 1996 budget/execution plan.

SOUTHDIV (Mark Taylor):

- Investigate and coordinate possible use of either Corps of Engineers or 8(a) contractor for "voluntary corrective action" removals at such sites as SWMUs 3, 7, and two gray areas.
- Provide David Williams with a copy of EPA's February 1990 letter addressing NFA SWMUs.

TDEC (Jim Morrison):

- Provide review comments on the Work Plan for SWMUs 66/67 and Tank Removal Plan.
- Provide review comments on RFI Reports for Assemblies A, B, and C as they become available.
- Provide approval for the Work Plans for Assembly A (additional investigation), Assembly D, Assembly E, and the Follow-up Gray Areas.
- Organize radiation survey by TDEC personnel, based on list of potential sites provided by Rob Williamson.

TDEC (Clint Willer):

- Investigate the possible use of Tennessee's emergency response contract on federal property.
- Coordinate Corps of Engineer's presentation to the BCT on Tuesday, 24 October, 2:00 pm, on their tank removal capabilities.

USGS (Jack Carmichael):

- Coordinate High Frequency Seismic work with the Kansas Geological Survey.
- Investigate training opportunities for the BCT with the National Ground Water Association.

2. Reminder: next BCT meeting will be 23-25 October, with a RAB meeting scheduled for Tuesday, 24 October. FYI: Effective 01 October, the name of NAS Memphis has officially changed to Naval Support Activity (NSA) Memphis. Also, the NSA Memphis environmental office now has a fax number: (901) 873-7022, DSN 966-7022.

3. Please call if you have comments and/or questions: (803) 743-0610, DSN 563, e-mail: dlporter@efdsouth.navfac.navy.mil.



NAS MEMPHIS BCT MEETING MINUTES
25-26 SEPTEMBER 1995

The NAS Memphis BRAC Cleanup Team convened at 1:00 pm on Monday 25 September in the Environmental Department's conference room in building S-241. The following people were in attendance:

Lawson Anderson, EnSafe (Memphis)
Jack Carmichael, USGS (Nashville)
David Porter, SOUTHDIV
Mark Taylor, SOUTHDIV
Clint Willer, TDEC (Nashville)
David Williams, EPA Region IV
Rob Williamson, NAS Memphis

Lawson Anderson requested the agenda for the meeting be amended to include a field visit by the BCT to SWMUs 2 (Southside Landfill) and 9 (Sewage Lagoons). The purpose of the site visit being to determine access for the drill rig during the upcoming Assembly E investigation.

The team discussed follow-up agenda items and assignments from the previous BCT meeting in August:

EnSafe (Lawson Anderson):

- Conduct TV inspection of storm sewer line serving former Hangar N-6 and the surrounding area (field work scheduled for last week in September).
Per Lawson Anderson, local firms appeared to be intimidated by the health and safety considerations for the work, and Insituform is the only company which bid on the project (bid is expected soon). Work will probably take place the week of 9 October.

David Porter asked if EnSafe had looked into the possibility of a sewer line along Navy Road; and if such a line existed, was it to be included in the work (Jack Carmichael had mentioned this as a possibility during a previous BCT meeting, as a possible source of the PCE found in the background well adjacent to Navy Road). Lawson Anderson stated that EnSafe had determine that no sewer line existed along the northern edge of Navy Road.

A discussion followed on the PCE issue. As more information about groundwater flow is determined, it appears that flow from the commercial dry cleaners on the southside of Navy Road would be in the direction of the background well. Lawson Anderson noted that EnSafe's check into the history of the dry cleaners indicated that there has been a dry cleaners on the site since 1966. It is currently operating under the name of "Jetway Laundry and Cleaners" (5437 Navy Road), and formerly operated under the names of "Laxton Laundry" and "Johnson Laundry." The BCT discussed the use of the DPT rig to get another sample near the dry cleaners (the DPT rig will be on site in mid-October). The PCE at the background well was in the top of the fluvial, so DPT can go that deep. Clint Willer suggested that we request the owners to conduct one DPT sample on their property. It was

decided that a letter to the owners from the Navy, quoting BRAC/CERCLA requirements, and coordinated with the station's JAG, would be required to obtain this access. (NOTE: During a subsequent field visit on Tuesday, it was decided that the DPT rig could push within the NAS Memphis fence line at the rear of the property and be within 30 feet of the back door of the cleaners. It was decided by the BCT that such an approach would be less complicated than securing permission to enter the property).

- Incorporate finding-to-date for all Assembly A SWMUs in the Assembly A RFI report (submit report in sections - by SWMUs).

Lawson Anderson provided the following status on the various parts of the Assembly A RFI:

SWMU 60	Shipped to all parties on Friday, 22 September.
SWMU 3	Provided to Navy on 27 September (Navy to review before releasing for general review)
SWMU 7	To be provided to Navy early next week (02-06 October).
SWMU 8	To be provided to Navy early next week (02-06 October).
SWMU 5	Will follow SWMUs 7 and 8.
SWMU 1	Will follow SWMUs 7 and 8.

- Complete Assembly B RFI Report.

Per Lawson Anderson, Assembly B RFI report will be completed the week of 02-06 October. Lawson Anderson questioned the BCT if a Preliminary Risk Evaluation (PRE) will be sufficient as a basis for a NFA at SWMU 40. David Williams stated that a PRE would be sufficient.

- Complete Assembly C RFI Report.

Per Lawson Anderson, Assembly C RFI report will be completed the week of 09-13 October.

- Incorporate TDEC/EPA comments on the Assembly D work plan, and issue a final document.

Per Lawson Anderson, Work Plan for Assembly D has been finalized and distributed.

- Incorporate TDEC/EPA comments on the Assembly E work plan, and issue a final document.

Per Lawson Anderson, Work Plan for Assembly E has been finalized and distributed.

- Develop "voluntary corrective action" plans for SWMUs 1, 60 (after additional sampling is conducted), N-122, and N-7.

EnSafe will develop the plans, and is scheduled to conduct voluntary correction actions on N-7 and N-122 the week of 09 October.

- Revise/update color environmental condition of property map for property to be transferred (overlay with map from the community's reuse plan).

Lawson Anderson stated that the map update has been completed; however, they just received the overlay from the city's reuse contractor. Note: David Porter began a side discussion of the community's reuse plan and FAA issues with the mode of property transfer (Economic Benefit Conveyance vs. Public Benefit Conveyance). The current reuse plan is based on Economic Benefit Conveyance, and the sale of property for revenue generation. The FAA will only approve a plan based on Public Benefit Conveyance of the airfield. Therefore, the viability of the reuse plan is in question until the method of property transfer is determined.

- Develop sampling plan for PCB area on the south side, based on old aerial photograph (activity to collect samples during Assembly D field work).

EnSafe has not accomplished this task, but will do so. David Williams gave Lawson Anderson EPA's POC for PCB sampling issues: Greg Brown. The activity will collect the samples at the site (near S-242) based on EnSafe biased sampling plan, and EnSafe will analyze with the SWMU 11 (Oiled Dirt Roads) and Horse Trail PCB samples.

EPA Region IV (David Williams):

- Investigate sources of training suggested by Jim Morrison, and provide BCT members with a listing. David Williams stated that because of budget cuts, EPA is not offering any technical training courses of interest to the BCT. Jack Carmichael offered to investigate training opportunities with the National Ground Water Association.
- Review and provide comments on proposed additional sampling at SWMUs 5, 40, and 60, and RFI Reports for Assemblies A, B, and C. David Williams had no comments on the plan for additional sampling at SWMU 5, 40, and 60. EnSafe is in the process of finalizing the RFI Reports for Assemblies A, B, and C.

In regard to these upcoming reports, Rob Williamson questioned the current policy of placing two copies in the RAB Library at the Mayor's office. He noted that they are rapidly running out of space, and the material is looked at infrequently. He also noted that the Mayor's staff is not allowing the material to be taken out of the office. This is in conflict with the original purpose of having the RAB Library, which was to give the RAB members access to two copies exclusively for their use which they could check-out and take home for reading. The BCT decided that this issue should be a topic on the agenda for the next RAB meeting. The BCT also discussed the number of documents needed for SOUTHDIV and the NAS Memphis environmental office. It was decided that one copy of documents will be provided to SOUTHDIV, one for the environmental office at NAS Memphis, and Lawson Anderson will make and retain several copies at EnSafe in case additional requests are received.

It was noted that NAS becomes Naval Support Activity (NAVSUPACT or NSA) effective 01 October.

NAS Memphis - Environmental (Tonya Barker/Rob Williamson):

- Coordinate the disposal of IDW from Assembly A investigation - confer with new CO, CAPT Mallory, regarding the use of Federal Prisoner labor/use of SWMU 60 as a disposal site. Per Rob Williamson, prisoner labor will be available in October. The environmental office still has reservations about the use of prisoner labor, and will probably opt for disposal via contractor. He has not spoken with CAPT Mallory about the subject, but will do so next week. He noted that \$ 82,000 remains in the account to accomplish the IDW disposal.
- Confirm possible locations of past uses of radioactive paints with Mr. Fumich, and coordinate with TDEC on radiation survey. Rob Williamson talked with Mr. Fumich, who indicated that radium dials were painted at NAS Memphis in the 1950s and 1960s. This work was conducted in small paint booths, and he recalls cans in each work space. He also recalls that vacuum tubes were disposed in dumpsters, and that paint may have been sent to landfills. Mr. Fumich retires at the end of the week, but Rob Williamson has his home phone number. David Williams noted that EPA has a checklist to use to determine if a radiation survey is necessary. EPA considers a reading of greater than 15 milliroms to be a radioactive release. POC at EPA is John Richards (did radiation survey at Charleston NSY). Rob Williamson will put together a building list for TDEC to use to conduct the survey. TDEC will not survey the landfills: can't get readings from low radiation sources at depths greater than one foot.

On a related radiation issue, David Williams noted that in a conversation with EPA personnel it was suggested that the tritium test used as an indicator of age of the Memphis Sands aquifer may not be useful. Jack Carmichael disputed this fact.

- Collect samples from PCB area on the south side (coordinate with EnSafe during Assembly D investigation). Lawson Anderson stated that a sampling plan would be provided this week, and that the activity needs to conduct the sampling next Wednesday or Thursday (5/6 October).

As an item of discussion for the upcoming Assembly E investigation field work, Rob Williamson stated that there is no place to store IDW on the southside and it will need to be taken to the designated areas on the northside. If the IDW is hazardous waste, it must be transported perpendicularly across Navy Road at 7th avenue.

SOUTHDIV (David Porter):

- Develop budget/execution priorities for fiscal year 1996 based on the community's reuse plan, and develop possible consequences on reuse plans due to lack of sufficient funds.

David Porter provided the following BRAC and DERA funding levels for FY 96:

<u>BRAC</u> funded	\$ 1,574,000	<u>DERA</u> funded	\$ 948,000
awaiting funds	\$ 1,609,500	awaiting funds	\$ 445,000

He stated that the shortfall in funding should be transparent to the reuse committee, with the possible exception of the interim measure removals at SWMUs 66 and 67. He noted that SOUTHDIV is considering the use of a small business, 8(a), contractor for removal of tanks which should result in considerable cost savings and free the money for other use.

SOUTHDIV (Mark Taylor):

- Investigate contracting options for "voluntary corrective action" removals at SWMUs 3, 7, and 66/67, and possible removals at two gray area sites.

Per Mark Taylor, SOUTHDIV's Small Business Coordinator stated that the 8(a) contractor under consideration for the tank removals may also have the capability to do voluntary correction actions.

TDEC (Jim Morrison):

- Provide review comments on the Work Plan for SWMUs 66/67, Tank Removal Plan, proposed additional sampling at SWMUs 5, 40, and 60, and RFI Reports for Assemblies A, B, and C.
Clint Willer will check with Jim Morrison when he returns on the status of comments for SWMUs 66/67 and the Tank Removal Plan.
- Organize radiation survey by TDEC personnel, based on list of potential sites provided by Rob Williamson. Awaiting activity's list of sites and buildings to be surveyed.

TDEC (Clint Willer):

- Determine status of proposed new regulations for "non-regulated" tanks.
Per Clint Willer, there are no pending regulations on "non-regulated" tanks. There are efforts to develop a new groundwater aquifer classification system. This new system would result in more realistic classifications; however, many people are opposed to the proposal and it will probably be two years before it is implemented. In regards to the "non-regulated" tanks at NAS Memphis, there are still only two options: (1) Ask for enforcement discretion, or (2) petition for a change in the aquifer classification. Clint Willer suggests that the Navy clean the site to UST standards and ask for enforcement discretion.

USGS (Jack Carmichael):

- Investigate USGS capabilities with High Frequency Seismic.

Jack Carmichael is putting together a package of geological information about the base for the Kansas Geological Survey, which has an agreement with the USGS. It is associated with the University of Kansas and has done work at the Defense Depot in Memphis. The Kansas Geological Survey will develop a proposal for seismic work based on the information submitted, and will probably make a site visit in mid October.

Following the discussion of status of assignments and follow-up items, the team made site visits to SWMU 2 (southside landfill) and (sewage lagoons) for the purpose of determining access for drill rigs during the Assembly E investigation.

The meeting was adjourned for the day at 5:00 pm, and reconvened on Tuesday morning at 8:00 am. The following people were in attendance:

Lawson Anderson, EnSafe (Memphis)
Tonya Barker, NAS Memphis
Jack Carmichael, USGS (Nashville)
David Porter, SOUTHDIV
Mark Taylor, SOUTHDIV
Clint Willer, TDEC (Nashville)
David Williams, EPA Region IV
Rob Williamson, NAS Memphis

Clint Willer discussed the use of the Corps of Engineers as an alternative to an 8(a) contractor for tank removals. POC at the Memphis Engineering Division of the Corps is Mr. Bobby Littlejohn, at (901) 544-3356. Per Mr. Littlejohn, the Corps is able to remove tanks at an average of \$ 10,000 per tank (pulled and completely closed). Their primary function is river work; however, they are off the river and available to conduct tank removals from November to June. Fund transfer is handled through a MIRP. Clint Willer feels they also are capable of small voluntary removal jobs as well. Clint Willer arranged for the Corps to give a presentation on their capabilities at the next BCT meeting, 2:00 pm, Tuesday, 24 October.

Lawson Anderson noted that field work began at SWMU 40 on Monday, 25 September. Another EnSafe team is at SWMUs 5 and 60. The field work will take up this week. Geoprobe sampling at SWMU 60 will begin at the end of the week. Assembly D sampling will begin next week (2 October). TV inspection will begin the week of 9 October. Follow-up gray investigations will take place 9-18 October. DPT/Geoprobe work under the Assembly E investigation will take place 16 October - 10 November. Assembly E drilling operations are scheduled for mid November. Groundwater sampling for Assembly E is scheduled for the first of February 1996.

The BCT established the following dates needed for approvals of work plans from EPA/TDEC (verbals ok):

Assembly A (additional sampling)	25 September
Assembly D	02 October

Assembly E
Follow-up Gray Areas

16 October
09 October

The team discussed a 30 review cycle for RFI reports. David Williams stated that Ted Simon, EPA's risk assessment reviewer, is backed up. Also, Assembly A and B will have ecological risk assessments, and David Williams noted that their ecological risk reviewer is backed-up 60 days. For SWMU 60 David Williams stated that he would not give the report to Ted Simon until all the sampling is complete.

Clint Willer requested that David Porter check on the distribution list for the draft Environmental Impact Statement (EIS). Clint Willer will provide the state's new distribution list.

Tonya Barker discussed a letter the activity is drafting to TDEC regarding RCRA operations (specifically the transportation of hazardous waste) once the northside of the facility is opened to the public. She stated that the Navy's legal opinion is that "the Navy still owns the roads", therefore their current mode of operation should be within requirements, and transporter's license and other transportation requirements for public roads should not be required. Clint Willer suggested that a trip to the Nashville TDEC offices would be more productive than a letter.

The team discussed the close-out of "no further action" (NFA) SWMUs: David Williams noted that a Statement of Basis is not needed for a NFA, and is only needed when you have a Corrective Measure Study (CMS). A CMS could result in institutional controls or a NFA. If a NFA is determined after a CMS, a "no action" Statement of Basis is needed. A Statement of Basis is the RCRA equivalent to a CERCLA Record of Decision. David Williams stated that he would prefer to have all NFAs lumped into one permit modification. David Williams requested that Mark Taylor send him a copy of EPA's February 1990 letter which listed NFA SWMUs.

The team discussed possible alternatives for handling SWMUs 66/67. David Porter noted that the negotiated price for interim removal with SOUTHDIR's Remediation Action Contractor (RAC) Morrison Knudsen is \$ 357,000. Funds were not available in FY 95 to conduct the work, and will probably not be available in FY 96. Although this is a cost-plus contract, and actual costs could be lower, the team all felt the estimate was excessive. Clint Willer discussed the use of OHM, Tennessee's emergency response contractor. There may be an issue with handling a federal site, and he will get an opinion from the state council on the issue. David Williams discussed the use of EPA's Technical Assistant Team (TAT) contractor, Westin, for emergency response; however, he feels there is a problem using the TAT at federal facilities.

The team also discussed the use of either the activity or EnSafe to sample (this is within scope their of investigation/interim measures). Sampling would following the work plan developed by Morrison Knudsen. Assuming the sites are clean, the activity could get their Base Operating Services (BOS) contractor, DynCorp, to do the work under a service call. They are capable of handling the CFC recycling from the refrigerators.

After considerable discussion, the BCT arrived at the following decisions (activity will use IDW money to fund):

SWMU 66: EnSafe will sample following the work plan developed by Morrison Knudsen. Initial sampling will require level B (for drum sampling of unknowns). Activity will observe the work, and may participate as a training exercise. Assuming the sampling shows that the site is not contaminated, the activity will have their Base Operating Services contractor, DynCorp, clean-up the area, including CFC recycling from the disposed refrigerators.

SWMU 67: The activity will oversee the cleanup of SWMU 67. They will first attempt to have MWR conduct the clean-up, but if that fails, they will handle the work through their BOS contractor. The clean-up will be terminated by the activity if any drums or other environmental problems are encountered.

The team adjourned for lunch at 11:30 am and reconvened at 1:00 pm. Prior to returning after lunch, a portion of the team made a site visit to fence line on the southside near the commercial dry cleaners. It was decided that the fence is close-enough to the dry cleaners and obtain a DPT sampling on Navy Property. The BCT determined that a DPT sample at the fence line will be sufficient, and will eliminate the need to obtain permission to enter the dry cleaner's property.

Jack Carmichael discussed the cyclic data from pump tests at a well near N-126. He is unsure of the cause, but something is stressing the system from around 9:30 pm to 11:00 am. He speculates that it may be electrical interference, instrumentation, or pumping.

The team discussed the RAB agenda for the meeting schedule for 24 October. Among the items were the followings:

- Presentation of an updated color map showing environmental condition of property with an overlay of the community's reuse plan.
- Presentation of a fact sheet covering the general steps in the RCRA cleanup process.
- RAB Library issues
- Meeting frequency
- Budget for FY 96 and Effects on the Reuse Plan
- Update on field work: investigations and removals.

The team noted that during the next RAB we should establish the next meeting date, as the normal 2-month cycle would place it at the end of December. Clint Willer suggested we consider letter updates to the RAB for November and December.

David Williams noted that he will not be able to attend the next BCT/RAB meeting due to this wife's impending delivery, but will be available for a teleconference call. Clint Willer noted that he will attend only on Tuesday, 24 October. David Williams stated that he may not be able to travel to attend the November BCT. The team discussed a possible BCT meeting in Atlanta in November. Clint Willer stated that the state would be able to attend, but will need 30 days advance in order to secure out-of-state travel arrangements.

The meeting was adjourned at 2:30 pm.